

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-000041

**ASSENTED TO MOTION TO REMOVE SPYWARE FROM DEFENDANT'S
ELECTRONIC DEVICES**

NOW COMES the Defendant, Ian Freeman, by and through counsel, and respectfully moves that this Honorable Court order the removal of all government spyware from all electronic devices owned and operated by the Defendant.

As grounds for and in support of, the Defendant states as follows:

1. The Defendant is awaiting trial scheduled to begin on December 6, 2022.
2. The parties agree there is no further need for the United State's government to keep spyware on Mr. Freeman's electronic devices.
3. Support staff for the defense has been in contact with Assistant US attorney Seth Aframe who assents to the granting of this motion.

WHEREFORE, The Defendant prays that this Honorable Court order the removal of all government spyware on his electronic devices for the reasons stated in this motion.

Respectfully Submitted,

November 28, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name

387 Dover Road

Address

Chichester, NH 03258

City

State

Zip Code

(603) 224-4220

Phone Number

CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Seth Aframe, Esq. and Georgiana MacDonald, Esq of the U.S. District Attorney's Office, electronically through EFC on November 28, 2022.

November 28, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name